Comment Number	Commenter Affiliation	First name	Last name	Summary of Comment	CalRecycle Response	Revisions Needed	Section/ Area
W23-01	County Santa Cruz	Jeffrey	Smedburg	Proposed language for section 18943 (a)(5)(E):  Description of how each consumer that pays a carpet stewardship assessment, including but not limited to those in rural areas, will have reasonably convenient opportunity(ies) to manage their post-consumer carpet located in each county that has a carpet retailer or and in each county in which a local city or county governmental jurisdiction desires such opportunity to exist to manage their post-consumer carpet.	The changes made to the language of the regulation accomlishes the same purpose as the suggested edit of the commenter, therefore, no further changes are needed.	No	18943 (a) (5) (E)
W24-01	Los Angeles County	Margaret	Clark	Revise Section 18941(I) as follows: "Transformation" has the same meaning as defined in Section 40201 of the Public Resources Code means incineration, pyrolysis, distillation, or biological conversion other-than composting. "Transformation" does not include composting, gasification, or biomass conversion.'  While we acknowledge that the proposed definition of "transformation" is verbatim to current statute, we believe it would be more appropriate to refer to the PRC statute in order to assure consistency in the event the statute definition is revised. As an active member of the Bioenergy Interagency Working Group, CalRecycle is well aware and has been in support of legislative efforts to refine existing statutory definitions including the definition of transformation, which arbitrarily includes some conversion technologies, excludes other technologies, and makes no mention of many other conversion technology categories.	change. This will not have any impact on the regulation given the reference has the same definition for transformation.	Yes	18941(I)

through source reduction, reuse and recycling must be greater than, and grow at a higher rate than the management of carpet through Carpet As Alternative Fuel, and other forms of transformation."  We are more concerned with the structure of this section, which essentially equates Carpet As Alternative Fuel (CAAF) with transformation. As explained by CalRecycle staff, CAAF is a product made from residual (unrecyclable) carpet waste while transformation is a subset of processes that can utilize CAAF. As currently drafted, this section not only fails to acknowledge various other conversion technologies not included under transformation that can also utilize CAAF but also confuses a product with a process.  W24-03  Los Angeles County  through source reduction, reuse and recycling must be greater than, and grow at a higher rate than the management of carpet in any form, including Carpet As Alternative Fuel (CAAF), used as a fuel."  (CAAF), used as a fuel."  W24-03  Los Angeles County  Margaret Clark  Delete Sections 18943(a)(7)(F)(a) and 18944(a)(7)(I)(a): "Funds-designated for CAAF, must be supported with documentation that requirement that additional documentation be	W24-02	Los Angeles	Margaret	Clark	Revise Section 18943(a)(4)(B) as follows: "Management of carpet	CalRecycle does not intend to equate CAAF with	Yes	Section
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						supporting documents. CalRecycle believes		
controversy over this topic.						this approach is necessary, given the		
						controversy over this topic.		
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W24-04	Los Angeles	Margaret	Clark	Delete Section 18943(a)(12): "Environmental information. Plans shall be-	CalRecycle agrees it is the lead agency and	No	Section
	County			accompanied with information to assist in completing an initial study	responsible for preparing the CEQA initial study		18943 (a)
				under the California Environmental Quality Act."	and disagrees with the comment to delete		(12)
					section 18943(a)(12). CalRecycle cannot		
				This requirement is vague and does not provide sufficient information to	complete its CEQA analysis, which is required		
				be instructive to manufacturers complying with the Regulations. It is also	for adopting the stewardship plan, without		
				unclear why this section is necessary. Under this section, plans are	environmental information from the		
				required to be accompanied with information for the California	manufacturers/ stewardship organization. This		
				Environmental Quality Act (CEQA) compliance. The Task Force would like	provision thus is needed to give notice to the		
				clarification on what the basis is for this requirement under AB 2398. The	organizations submitting a plan who may not be		
				Task Force believes CalRecycle is the responsible agency for CEQA	familiar with CEQA. By including the need to		
				compliance, and therefore recommends deleting the section entirely.	provide environmental information, this		
					requirement provides clearer direction,		
					encourages environmental considerations in		
					the design of the plan, and allows for		
					CalRecycle to assess the plan and make a		
					determination on its approval. During the plan		
					development stages, CalRecycle and the		
					stewardship organization are in regular		
					communication and can discuss the details of		
					what information is needed.		

W25-01	SWANA	William	Merry	The LTF is concerned with new requirements in Sections 18943 (a)(7)(F)(a) and 18944(a)(7)(I)(a) that single out funds designated and spent on CAAF for additional documentation requirements. There are several reasons that this new requirement should be removed from the proposed regulations:	For comment 1: The report mentioned is about non-combustion thermal technologies and focuses on three conversion technologies: concentrated acid hydrolysis, gasification; and catalytic cracking. The report is general and	No	
				1. CalRecycle has already validated the net environmental benefits of conversion technologies in the New and Emerging Conversion Technologies Report (CalRecycle, 2007). The required documentation contained in the sections identified above is redundant and unnecessary.	does not analyze carpet as a feed stock. CalRecycle is seeking information specific to carpet and anticipates that the stewardship organization or individual manufacturer		
				2. Documenting the "net environmental" benefit as required by the revised regulations will require the unnecessary expenditure of resources. Depending on how CalRecycle ultimately implements this requirement, and what type of documentation is deemed acceptable, the cost could be prohibitive.	For comment 2: See W24-04. This type of expenditure is already required under CEQA law.  For comment 3: CalRecycle is seeking statewide		
				<b>3.</b> The regulations contain no description of the criteria that would be used to confirm that CAAF does indeed provide a net environmental benefit over landfilling. Without this type of guidance the requirement simply serves as a roadblock to the effective and convenient utilization of CAAF.	information on CAAF and its impacts in the stewardship plan, rather than facility by facility type information on a continual basis submitted by those facilities. A key reason for the additional information is due to the use of incentives for CAAF and the controversy over		
				<b>4.</b> AB 2398 contains no basis for singling out CAAF for additional, potentially prohibitive, documentation requirements. If this requirement to provide documentation of the "net environmental benefit" is to be included in the regulations, which we do not believe it should be, it should be applied to all products derived from carpet.	this as noted in the response to W24-03		
W25-02	SWANA	William	Merry	See W24-04	See W24-04	No	Section 18943 (a) (12)